

APPLICANT(S): SHARON, David  
SERIAL NO.: 10/056,049  
FILED: January 28, 2002  
Page 7

### REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

### Status of Claims

Claims 1 - 8 and 10 - 20 remain pending in the application. Claims 1 - 8 and 10 - 20 have been rejected. Claims 1, 8, 10 and 18 have been amended. New claims 21 - 27 have been added. Applicants respectfully assert that no new matter has been added.

### CLAIM REJECTIONS

#### 35 U.S.C. § 103 Rejections

Claims 1, 2, 4 - 8 and 10 - 20 were rejected under 35 U.S.C. § 103(a), as being unpatentable over Fernandez et al. (U.S. 6,697,103, herein after "Fernandez") in view of Johnson (US 6,275,855).

Claim 3 was rejected under 35 U.S.C. § 103(a), as being unpatentable over Fernandez et al (US Patent No. 6,697,103) in view of Monroe (US Patent No. 6,246,320).

Applicant respectfully traverses the rejections of claims under 35 U.S.C. § 103(a) in view of the remarks that follow.

Independent claims 1, 8, 10 and 18 were amended to include "application bank [being] external to said processing unit(s)". The Examiner at page 5 of the office action refers to storage 49 and software 66 as analogous to the application bank claimed in claim 1 and to microprocessor 48 as analogous to one of the processing units claimed in claim 1. As one can clearly see at Fig. 3 (and Fig. 2) of Fernandez, both software 66, storage 49 and processor 48 reside within controller 6 of Fernandez. Accordingly, Fernandez does not teach or suggest

APPLICANT(S): SHARONI, David  
SERIAL NO.: 10/056,049  
FILED: January 28, 2002  
Page 8

"application bank [being] external to said processing unit(s)", as claimed by each one of claims 1, 8, 10 and 18. Likewise, Johnson or the combination of Fernandez and Johnson does not teach or suggest "application bank [being] external to said processing unit(s)", as claimed by each one of claims 1, 8, 10 and 18.

Moreover, during the interview dated May 8, 2007 and in the "Interview Summary", the Examiner has indicated that amending the claims to include the element of dynamically instructing to install (a content-analysis application from the application bank to a processing unit) may overcome the prior art. The claims have been amended accordingly in response to the previous Office action.

Still, in the subject Office action, the Examiner maintained the rejection based on Fernandez and Johnson. Applicants disagree with the Examiner's allegations presented at section 3 of the Office action (pages 2 and 3) for the following reasons:

First the Examiner referred to the teaching of Fernandez and in particular to the quotations presented below. At column 1, line 44 – 46 Fernandez discloses:

"An object database or functionally equivalent data structure provided in digital storage and accessible to control software[,] dynamically stores one or more positional and relative movement as well as optional associated map data (emphasis added)".

Applicants respectfully submit that the quotation above merely discloses, dynamically storing data in a database, which is different than "automatically, without user input, and dynamically in real-time after receiving the alert, instructing to install another content-analysis application into a video or audio processing unit from an application bank having content-analysis applications", as recited for example by claim 10. At column 1, line 1 to col. 2 line 3 Fernandez discloses:

"Fig. 1 illustrate a general block diagram of preferred embodiment of integrated fixed and/or mobile network system or apparatus for performing real-time historical and/or predictive monitoring and data processing, of one or more remote or local objects 2 (emphasis added)".

APPLICANT(S): SHARONI, David  
SERIAL NO.: 10/056,049  
FILED: January 28, 2002  
Page 9

Applicants respectfully submit that the quotation above does not teach or suggest "automatically, without user input, and dynamically in real-time after receiving the alert, instructing to install another content-analysis application into a video or audio processing unit from an application bank having content-analysis applications".

Further the term "real-time" contradicts the term "historical" and therefore the entire sentence is unclear and ambiguous. Still, it is clear that the quotation above is not directed to dynamic installation of content-analysis applications whether in real time or otherwise. At column 4, lines 43-50 Fernandez discloses

"Alternately in facility monitoring application, detectors 3 may be implemented to sense state and other measurement signals from motion detector, burglar alarm, door or window open/close detector, smoke detector, thermostat, phone answering machine, or other electrical home appliance. In certain instances, e.g., unauthorized home entry, such sensed state may trigger other functionality, such as taking electronic photograph and/or notifying certain entities (emphasis added)".

The quotation above describes triggering of taking electronic photograph and/or notifying certain entities. However, in contrast to the Examiner's contentions, the quotation above does not teach or fairly suggest "automatically, without user input, and dynamically in real-time after receiving the alert, instructing to install another content-analysis application into a video or audio processing unit from an application bank having content-analysis applications". At column 5, line 61 through column 6, line 4 Fernandez discloses:

"Further, as described herein, control software 66, preferably including one or more modules described hereunder and provided in whole or in part in storage 49 for execution by processor 48 in target unit 4 and/or controller 6 to enable communications 161 between such fixed and mobile components, maintain object data status and mapping information 162, track and correlate movement activity from different sources 163, maintain system security and access 164, manage object-related electronic transaction 165, diagnosis and analyze object performance,

APPLICANT(S): SHARONI, David  
SERIAL NO.: 10/056,049  
FILED: January 28, 2002  
Page 10

provide data reporting , and analyze visual object information 168"  
(emphasis added).

The quotation above merely describes running an application that is already installed at storage 49 of central processor 6 or unit 4 by a respective processor 48 residing within the same unit. However, in contrast to the Examiner's contentions, the quotation above does not teach of fairly suggest "automatically, without user input, and dynamically in real-time after receiving the alert, instructing to install another content-analysis application into a video or audio processing unit from an application bank having content-analysis applications".

At column 6, line 61 through column 7, line 2, Fernandez discloses:

"Additionally, controller user may provide input to specify or request current or future monitoring or surveillance of one or more certain location (i.e., associated fixed detector site) or object (i.e. associated mobile target unit site). In this manner, [after input from user was provided] software 66 is configured or updated via database records, object movement and observation rules, object, target unit or controller communications therewith, as well as any related transaction, diagnosis, reporting and security considerations appropriate to include, for recognizing or searching one or more object, or contextual observations at detector sites or object directories associated therewith (emphasis added)".

The quotation above teaches manual activation by a human for the purpose of updating software 66, which includes many software applications, not necessarily content-analysis applications. Applicants respectfully assert that even if the phrase "software 66 is configured or updated" may be interpreted as installation of a software application, it is clear from the context that first a human user must request monitoring or surveillance of a certain location or object.

Accordingly, in contrast to the Examiner's contentions, the quotation above does not teach of fairly suggest "automatically, without user input, and dynamically in real-time after

APPLICANT(S): SHARONI, David  
SERIAL NO.: 10/056,049  
FILED: January 28, 2002  
Page 11

receiving the alert, instructing to install another content-analysis application into a video or audio processing unit from an application bank having content-analysis applications".

The Examiner further referred to column 8, lines 44 – 53 of Fernandez. At column 8, lines 44 – 53, Fernandez discloses in connection to controller 6:

Additionally software 66 therein includes operating system ... as well as innovative instruction code and any related firmware or circuitry/equipment code for analyzing and/or processing data according to preferred embodiment one or more of the following functional modules....object movement processing 163 ... and visual object analyzer 168 (col. 8, lines 31 – 43).

Such modules are generally user customizable and adaptable according to particular need for object surveillance. ... Additionally, to improve program performance, one or more of such modules may be omitted or uninstalled from controller (col. 8, lines 44 – 55)

Fernandez teaches the use of one or content-analysis applications pre-installed in the controller, which is a central processor receiving streams of video data from a plurality of sensors according to the user's preference. Modules may be uninstalled off-line prior to additional use of the system. The quotation above does not teach of fairly suggest "automatically, without user input, and dynamically in real-time after receiving the alert, instructing to install another content-analysis application into a video or audio processing unit from an application bank having content-analysis applications".

As to Johnson, Johnson teaches an improved system for facilitating computerized alert system information awareness. Upon receiving an alert, the system validates the information and apprises the operator of status modification by changing the color of a status icon on the display of the system (see column 5, lines 47 – 67). Thus, Johnson is clearly intended to provide a user with an alert. Fig. 3 of Johnson is a logic flowchart describing the method for providing the user with the alert:

The Examiner contends that box 120 (Analyze Event History) "clearly teaches that once alarm activates system automatically analyzes the event (emphasis added). Applicants strongly disagree. As can be shown at box 105 and as recited by column 6, lines 9 -115, the

APPLICANT(S): SHARONI, David  
SERIAL NO.: 10/056,049  
FILED: January 28, 2002  
Page 12

system clearly operates according to requests from an operator and only if a request from an operator has been received, the system connects the Improved Alert Monitoring System client as a console with command input capability to the monitored system. Column 6, lines 26 - 35 describe the Analyze Event History module as follows:

"At this point, an optional request can be made to retrieve all relevant history information associated with the alert object event 120. Such information may be made available to the Improved Alert Monitoring System operator by way of technology as manifested and disclosed in Applicant's application .... It will be recognized that this is an optional and not required feature of the instant invention".

It is quite clear from Fig. 3 and the quotation above that Johnson does not even teach automatically analyzing the event based on an alarm and certainly does not each or fairly suggest "automatically, without user input, and dynamically in real-time after receiving the alert, instructing to install another content-analysis application into a video or audio processing unit from an application bank having content-analysis applications".

Accordingly, Fernandez and Johnson, alone or in combination do not teach or suggest at least the above recited elements of claims 1, 8, 10 and 18. Accordingly, claims 1, 8, 10 and 18 are not obvious over the combination of Fernandez and Johnson.

Accordingly, Applicants respectfully submit that the independent claims 1, 8, 10 and 18 are allowable and requests that the 35 U.S.C. § 103(a) rejection of claims 1, 8, 10 and 18 be withdrawn.

Claims 2, 4- 7 and 11 - 17 are dependent, directly or indirectly, from one of claims 1 and 10, and include all the limitations of the parent claim. Therefore, the patentability of claims 2, 4- 7 and 11 - 17 follows directly from the patentability of one of claims 1 and 10. Therefore, applicants respectfully assert that claims 2, 4- 7 and 11 - 17 are likewise allowable and requests that the rejection of claims 2, 4- 7 and 11 - 17 be withdrawn.

APPLICANT(S): SHARONI, David  
SERIAL NO.: 10/056,049  
FILED: January 28, 2002  
Page 13

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Claim 3

The combination of Fernandez and Johnson was discussed above with respect to claim 1 and is likewise applicable here. Monroe cannot cure the deficiencies of the combination of Fernandez and Johnson. Accordingly claim 1 is patentable over the combination of Monroe, Fernandez and Johnson. Claim 3 is dependent from claim 1 and includes all the limitations of claim 1. Therefore, the patentability of claim 3 follows directly from the patentability of claim 1. Therefore, applicants respectfully request that the rejection of claim 3 be withdrawn.

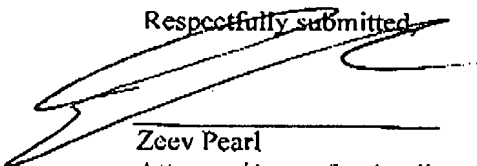
**CONCLUSIONS**

In view of the foregoing amendments and remarks, the pending claims are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Please charge any fees associated with this paper to deposit account No. 50-3355.

Respectfully submitted,



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